

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

EVERETTE CADDEN,)	
)	
Plaintiff,)	
)	
v.)	Case No.: 1:22-CV-347-PTG-JFA
)	
UNITED STATES OF AMERICA,)	
)	
Defendant.)	
)	

DEFENDANT’S TRIAL EXHIBIT LIST

Pursuant to this Court’s June 17, 2022 Order, Defendant, through its undersigned counsel, hereby respectfully submits its list of potential exhibits for the trial of the above-captioned matter. Defendant reserves the right to elect not to seek the introduction of any of these exhibits at trial, and to re-arrange the numbering sequence prior to trial. Pursuant to this Court’s Order, this list does not include exhibits that Defendant might seek to introduce as impeachment and/or rebuttal evidence. Moreover, Defendant reserves the right to use demonstrative exhibits during the testimony of certain of its witnesses in order to assist the trier-of-fact.

Defendant also reserves the right to use any exhibits listed on Plaintiff’s Exhibit List.

EXHIBITS

Exhibit No.	Bates Numbers	General Description
1	GPW 14–15	Patient Summary
2	GPW 17–18	10/27/2020 Dr. Amparo Pinzon-Avellaneda Dental Note
3	GPW 20–21, 128–29	10/26/2020 Dr. Amparo Pinzon-Avellaneda Dental Note
4	GPW 26–27	9/9/2020 Dr. Amparo Pinzon-Avellaneda Dental Note
5	GPW 130 – 31	8/27/2020 Dr. Amparo Pinzon-Avellaneda Referral

Exhibit No.	Bates Numbers	General Description
6	GPW 132	8/27/2020 Dr. Amparo Pinzon-Avellaneda Referral
7	GPW 29–30	8/27/2020 Dr. Amparo Pinzon-Avellaneda Dental Note
8	GPW 35–36	1/16/2020 Dr. Porscha Kinlaw Dental Note
9	GPW 37	1/15/2020 Telephone Encounter
10	GPW 41–42	12/19/2019 Dr. James Houseworth Dental Note
11	GPW 44–45, 138–39	12/2/2019 Dr. Ian Lam Dental Note
12	GPW 135–36	12/2/2019 Dr. Ian Lam Referral
13	GPW 137	12/2/2019 Dr. Ian Lam Referral
14	GPW 46–47	11/14/2019 Dr. James Houseworth Dental Note
15	GPW 60–61	10/28/19 Dr. Sneha Patel Dental Note
16	GPW 140–141	10/28/19 Dr. Sneha Patel Referral
	GPW 142	10/28/19 Dr. Sneha Patel Referral
17	GPW 64–65	10/17/2019 Dr. James Houseworth Dental Note
18	GPW 66–67	10/17/2019 Dr. Porscha Kinlaw Dental Note
19	GPW 68	10/8/2019 Telephone Encounter
20	GPW 69–70	10/3/2019 Dr. Sneha Patel Dental Note
21	GPW 72–73, 148–49	8/22/2019 Dr. Gustavo Arocha Dental Note
22	GPS 145–46	8/22/2019 Dr. Gustavo Arocha Referral
22	GPW 147	8/22/2019 Dr. Gustavo Arocha Referral
23	GPW 74–75	7/11/2019 Dr. Eliana Anderson Dental Note
24	GPW 76	6/6/2019 Telephone Encounter
25	GPW 77	5/30/2019 Telephone Encounter
26	GPW 304	5/24/2019 Referral Letter
27	GPW 307	5/9/2019 Referral Letter
28	GPW 78–79	4/18/2019 Dr. Sneha Patel Dental Note
29	GPW 81–82, 153–54	4/1/2019 Dr. Eliana Anderson Dental Note
30	GPW 150–51	4/1/2019 Dr. Eliana Anderson Referral
31	GPW 152	4/1/2019 Dr. Eliana Anderson Referral
32	GPW 83–84	3/25/2019 Dr. Eliana Anderson Dental Note
33	GPW 85–86	3/25/2019 Dr. Eliana Anderson Dental Note
34	GPW 88–89	2/11/2019 Dr. Eliana Anderson Dental Note
35	GPW 90–91, 158–59	2/4/2019 Dr. Eliana Anderson Dental Note
36	GPW 155–56	2/4/2019 Dr. Eliana Anderson Referral
37	GPW 157	2/4/2019 Dr. Eliana Anderson Referral
	GPW 93–94	12/31/2018 Dr. Eliana Cordova Dental Note
38	GPW 97–98	12/3/2018 Dr. Eliana Cordova Dental Note
39	GPW 99–100	11/9/2018 Dr. Eliana Cordova Dental Note
40	GPW 101–102	11/2/2018 Dr. Sneha Patel Dental Note
41	GPW 103–104	10/29/2018 Dr. Eliana Cordova Dental Note

Exhibit No.	Bates Numbers	General Description
42	GPW 105–106	10/22/2018 Dr. Eliana Cordova Dental Note
43	GPW 109–110	10/8/2018 Dr. Eliana Cordova Dental Note
44	GPW 115–116	8/6/2018 Dr. Eliana Cordova Dental Note
45	GPW 119–120	7/2/2018 Dr. Eliana Cordova Dental Note
46	GPW 121–22	6/18/2018 Dr. Eliana Cordova Dental Note
47	GPW 238	12/19/2019 Routing Slip
48	GPW 246	11/14/2019 Root Canal Therapy Consent Form
49	GPW 250	11/14/2019 Routing Slip
50	GPW 528–46	GPW X-rays
51	WOOFREC 2–15	Stephen Woof Medical Records
52	VCUDENTREC 1–15	Virginia Commonwealth University Dental Records
53	SNVMCRE 1 – 94	8/14/2020 Sentara Medical Center Records
54	SNVMCRE 95–176	9/28/2020 Sentara Medical Center Records
55	SNVMCRE 177–437	2/4/2021 Sentara Medical Center Records
56	SNVMCRE 438–442	2/5/2021 Sentara Medical Center Records
57	SNVMCRE 443–597	3/4/2021 Sentara Medical Center Records
58	PESOLYREC 1–33	Mary Washington Hospital Records
59	SAHNIREC 1–7	Dr. Sahni Singh Records
60	BETTEREC 1–23	Dr. Chetan Bettegowda/Johns Hopkins Records
61	VCUMEDCNTR 1–47, 81–83	6/9/2021 Virginia Commonwealth University Health Records
62	VCUMEDCNTR 48–56	7/29–30/2021 Virginia Commonwealth University Health Records
63	VCUMEDCNTR 57–63	8/26/2021 Virginia Commonwealth University Health Records
64	VCUMEDCNTR 64–70	9/16/2021 Virginia Commonwealth University Health Records
65	VCUMEDCNTR 84–88	10/20/2021 Virginia Commonwealth University Health Records
66	VCUMEDCNTR 71–74	12/2/2021 Virginia Commonwealth University Health Records
67	VCUMEDCNTR 75–79	3/3/2022 Virginia Commonwealth University Health Records
68	VCUMEDCNTR 89–91	4/12/2022 Virginia Commonwealth University Health Records
69	MINREC 1–3	Dr. Kyung Cheon Min Dental Notes
70	WATSONREC 1–18, 24–26, 28–30, 33–71	12/9/2021 Virginia Oral & Facial Surgery Records
71	WATSONREC 19–20	1/12/2022 Virginia Oral & Facial Surgery Records

Exhibit No.	Bates Numbers	General Description
72	WATSONREC 21–23	2/8/2022 Virginia Oral & Facial Surgery Records
73	WATSONREC 27	3/7/2022 Virginia Oral & Facial Surgery Records
74	DUCIEREC 1–8	12/9/2021 Dr. Ivica Ducic Dental Records
75	DUCIEREC 9–24	Everette Cadden Registration
76	DUCIEREC 26–62	2/8/2022 Dr. Ivica Ducic Additional Records
77	SHINWAREC 1–45	Dr. Hasnain Shinwari Dental Records
78	FFX ENDO 1–33	Dr. Salar Sanjari Dental Records
79	N/A	Exhibits Created During Dr. Sanjari's Deposition on 10/28/2022 (Additional Dental Records)
80	N/A	Blank Medical History Produced by Dr. Sanjari on November 7, 2022
81	N/A	Blank Pain History Produced by Dr. Sanjari on November 7, 2022
82	N/A	8/10/2022 Plaintiff's Interrogatory Responses
83	N/A	Plaintiff's Deposition Transcript
84	N/A	Plaintiff's SF 95 (Administrative Claim)

Date: November 15, 2022

Respectfully submitted,

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By: _____/s/_____
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